

# EXHIBIT B

D I C K S T E I N   S H A P I R O   M O R I N   &   O S H I N S K Y   L L P

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June 1, 2006

**VIA OVERNIGHT MAIL AND FACSIMILE**

Elizabeth A. Fegan, Esq.  
HAGENS BERMAN SOBOL SHAPIRO LLP  
60 West Randolph Street  
Chicago, IL 60601

Re: Baxter's Response to Plaintiffs' Omnibus Requests for Production of Documents;  
MDL 1456

Dear Ms. Fegan:

Enclosed please find two Hard Drives containing (BAX MDL E 1933030 – BAX MDL E 2631916) and (BAX MDL E 2631917 – BAX MDL E 2962307) which are being provided to you pursuant to Baxter's rolling production in response to the above discovery requests. Please return the Hard Drives to Dickstein Shapiro or send a check for \$300.00 per Hard Drive for the cost of replacements. A privilege log for today's production is forthcoming.

Included in this production are the following:

(i) Documents from the following BioScience division sales representatives and other sales employees: Kevin Ellebrecht, Deyanira Giraldez, James Hrabovsky, Nicole Luikaart, Haleem Mady, Kevin Maxwell, Stacey McCrear, Peggy McNulty, Keith Murray, Stephanie Polfus, Keith Stanek, Andrew Kaplan, Samantha Lee, Kimberly Peterson, Thomas Notaro, Patrick Holt (BAX MDL E 1933030 – BAX MDL E 2631916);

(ii) Documents from the following Medication Delivery division sales representatives and other sales employees: Jane Brashaw, Jodie Ehler, Pamela Hitchmoth, Marie Holmes, David Lynch, Cynthia Mandic, Matthew McGuire, Jennifer Mumma, Robert Munerance, Daniel Nagel, Raye Remback, Richard Rice, Brad Romike, Steven Spaudie Jr., Judith Carnes, Kimberly Casey, Elizabeth Frontz, Jill Groves, Cecile Hogan, Christine Hoglund, Janice Kann, Alan Kirgan, Bonnie Lamb, Nancy Laue, Kathryn Lefebve, Jorja McEwen, Kimberly McQuade, Tamara Miller, Michelle Niday, Michelle Norton, Hope Ptak, Louis Rofrano Jr., Lori Rumer, Brenda Stewart, Richard Hotzfeld (BAX MDL E 1933030 - BAX MDL E 2631916);

(iii) Documents from Ann Blackwood, Government Affairs Manager; Michael Bradley, BioScience Healthcare Economics and Reimbursement; Tom Dovas, Medication Delivery Marketing; David Drohan, Medication Delivery President; John Guedry, Medication Delivery Trade Accounts; Bryant Gunnerson, BioScience Finance and Accounting; Dorine Hernandez, BioScience Marketing; Cheryl Hoo Chung, Global Finance; Harry Kraemer,

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Corporate Services; Angela Marino, Medication Delivery Marketing; Gordon Mazursky, Corporate Services; Michelle Michalak, BioScience Marketing; Leslie Nelson, Medication Delivery Healthcare Economics and Reimbursement; Chad Ness, BioScience Finance and Accounting; Anthony Nix, BioScience Finance; Jeffery Nordquist, Medication Delivery Marketing; Elaine Peterson, BioScience Marketing; Jelena Popadic, BioScience Marketing; Alton Shader, BioScience Marketing; Tammy Siden, Global Supply Chain; Gregg Tures, Corporate Services Customer Service (BAX MDL E 1933030 - BAX MDL E 2631916); and

(iv) Documents from Paul Ashba, BioScience Legal; Marie Borselle, Medication Delivery Sales; Michael Bradley, BioScience Healthcare Economics and Reimbursement; Michael Buha, Medication Delivery Sales; Joseph Darling, Medication Delivery Sales; Ivan Forehand, Medication Delivery Sales; Lawrence Guiheen, BioScience Executive; Bryant Gunnerson, BioScience Finance and Accounting; Mark Haber, Medication Delivery Sales; Scott Hippensteel, Medication Delivery Marketing; Marie Keeley, Medication Delivery Sales; Michael Land, BioScience Sales; Nick Poulos, BioScience Clinical Affairs; Craig Prather, Medication Delivery Sales; Michelle Priefer Walbert, BioScience Marketing; Juliana Reed, Medication Delivery Healthcare Economics and Reimbursement (BAX MDL E 2631917 - BAX MDL E 2962307).

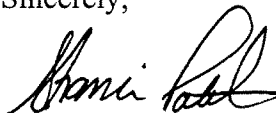
Please note that in our May 30, 2006 production we incorrectly identified one of the two Hard Drives as containing Bates range BAX MDL E 0669393 – BAX MDL E 1478930. The correct Bates range for that Hard Drive is BAX MDL E 0668429 – BAX MDL E 1478930.

By this letter we also produce to you for inspection, documents contained in our on-line repository. (See Letter from Merle M. DeLancey Jr. to Elizabeth A. Fegan, March 26, 2006). To access the repository, go to "[www.lextranet.com](http://www.lextranet.com)," enter "Login," enter "Version 4 Login," enter User name "efegan9709," and Password "e645f224" Additional user instructions are enclosed.

By making this production, Baxter does not waive any jurisdictional, substantive, or procedural defects or any of its objections to Plaintiffs' discovery requests. The documents are also produced subject to, and without waiver of, the attorney-client, work product, and/or any other applicable privileges. Baxter's document production efforts will continue on a rolling basis.

Please do not hesitate to contact me should you have any questions.

Sincerely,



Shamir Patel

Elizabeth A. Fegan, Esq.

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Enclosure